



BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
Docket No. 2004-178-E

RECORDED
2004 OCT 22 AM 10:56
30 PUBLIC SERVICE
COMMISSION

In re:)
)
South Carolina Electric & Gas)
Company—Application for)
Adjustments in the Company's)
Electric Rate Schedules and Tariffs)
_____)

**COLUMBIA ENERGY LLC'S
RESPONSES TO SCE&G'S
1st REQUESTS FOR PRODUCTION**

Pursuant to S.C. Rules of Civil Procedure, 26 S.C. Reg. § 103-851 & 103-854, and other applicable rules of practice and procedure of the Public Service Commission of South Carolina ("Commission"), Columbia Energy LLC ("Columbia Energy") responds to the First Set of Requests to Produce of South Carolina Electric and Gas Company ("SCE&G") as follows:

Request No. 1: Please provide the most complete current resume for each individual identified in response to Interrogatory 1-1.

Response:

The resume of David Dismukes was filed and served with his testimony.

Request No. 2: Please provide all documents identified in response to Interrogatory 1-6.

Response:

See Columbia Energy's supplemental response to Interrogatory 6. The exhibits referred to therein were pre-filed on October 11, 2004.

Request No. 3: Please provide all documents identified in response Interrogatory to 1-8.

Response:

See response to Interrogatory 8.

Request No. 4: Please provide all documents identified in response to any other interrogatory.

Response:

None.

Request No. 5: Please provide a complete and accurate transcript of all testimony (including cross examination testimony) provided by any individual identified in response to Interrogatory 1-1 in any proceeding occurring after January 1, 1999.

Response:

Objection, this request is overbroad and unduly burdensome and is not reasonably calculated to lead to the discovery of admissible evidence.

Dated this 22 day of October, 2004.

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Attorneys for Columbia Energy LLC

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CERTIFICATE OF SERVICE

This is to certify that I, Toni C. Hawkins, a paralegal with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below **Columbia Energy LLC's Responses to SCE&G's 1st Requests for Production** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

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Dated at Columbia, South Carolina this 22nd day of October, 2004.


Toni C. Hawkins